

**JD**  
**DIBENEDETTO**  
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November 7, 2023

**VIA ECF**

The Honorable Victor Marrero  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 11/9/23
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**Re: United States v. Saro Mouradian, et al.**  
**20 CR 652 (VM)**

Dear Judge Marrero:

I write, with no objection from the government and Pretrial Services, to respectfully request that our client Paul Mouradian's bail conditions be modified to allow him to travel with his daughters to their out of state rhythmic gymnastics events.

Mouradian, a Florida resident, is currently released on a \$250,000 personal recognizance bond secured by Fifty Thousand Dollars cash and with travel limited to Florida and the Eastern and Southern Districts of New York. Mouradian's daughters are Olympic hopefuls and compete at a high level both regionally and nationally. Mouradian is requesting that he be allowed to travel with his wife and children from their home to Denver, Colorado and Los Angeles, California from December 8, 2023, through December 19, 2023, for their rhythmic gymnastics events. Mouradian is heavily involved in their daily training and his daughters rely on him for moral support during these high-pressure moments.

I have spoken with government counsel and pretrial services. Government counsel defers to Pretrial Services and Pretrial Services has no objection so long as Mouradian provides his Pretrial Services officer with his itinerary.

<b>Request GRANTED.</b> The above request is hereby granted on the conditions specified by Pretrial Services.
<b>SO ORDERED.</b> 11/9/2023 DATE
 VICTOR MARRERO, U.S.D.J.

Respectfully submitted,

/s/  
Joseph DiBenedetto